

**SAN DIEGO REGIONAL BOARD RESPONSES TO COMMENTS
TENTATIVE ORDER NO R9-2007-0148**

A. Comments submitted by the Department of Transportation on November 28, 2007

GENERAL COMMENTS & MAJOR CONCERNS	REGIONAL BOARD RESPONSES
<p>1. <u>Finding No. 9 described the facility as being in category 2C.</u></p> <p>Due to the nature of the discharge expected at the inspection station and the small amount of discharge actually processes through the passive treatment system, the Department believes that this system should be classified as a 3C.</p>	<p>Based on the threat to water quality and complexity, this facility cannot be reclassified as 3C because treatment of the sump wastewater is needed to ensure protection of the groundwater beneficial uses and water quality objectives.</p> <p>Upon further review of the discharge, however, the Regional Board will change the category of this facility from 2C to 3B.</p> <p>See Errata Sheet Item No. 1</p>
<p>2. <u>Discharge Specifications, No. 2: Performance Requirements for Total Dissolved Solids of 450 mg/l as a 12-month average and 750 mg/l as a daily maximum have been established. The Department requests the 12-month average be changed to 750 mg/l and the daily maximum be changed to 1,000 mg/l.</u></p> <p>Sampling from an adjacent well yielded results of 460 mg/l, which is above the 12-month average. The system would be in violation the moment the discharge commences.</p>	<p>Discharge Specifications cannot be set at a level that would permit water quality to change to such a degree that the beneficial uses designated for the protection are unreasonably affected. Although the discharge is anticipated to be 550 gallons per day, given the results of the adjacent well, this discharge has a potential to cause basin plan objectives for the Campo Hydrologic Area to be exceeded. Discharge Specifications of 750 mg/l as a 12-month average and 1,000 mg/l as a daily maximum would not reasonably protect beneficial uses or prevent conditions of nuisance.</p> <p>If, after on year of sampling, the 12-month average is exceeded, the Department may be required to consider alternative treatment systems for this facility.</p>
<p>3. <u>Discharge Monitoring, No. 1: The septic tank effluent flows by gravity to the leach field and a flow meter cannot be installed on a gravity flow line. The Department requests that the water meter usage be submitted for the septic tank flow monitoring requirements in lieu of the septic tank flow.</u></p>	<p>The Regional Board will make modifications to allow water meter usage to be submitted in lieu of the septic tank flow.</p> <p>See Errata Sheet Item No. 3.</p>
<p>4. <u>Discharge Monitoring: The Department requests to perform the wastewater sampling semiannually for two years. If the results of the effluent for the two years has consistent results and no impacts to groundwater then the monitoring can be reduced to annually.</u></p>	<p>The Regional Board will make changes to septic tank effluent monitoring.</p> <p>See Errata Sheet Item No. 2.</p>

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<p>5. <u>Discharge Monitoring-Sump Monitoring: The Department requests the monitoring for solvents, pesticides, and PCB's be removed.</u></p> <p>There are no solvents being used in the inspection bay or to inspect the trucks. There could be some oil, gas, or diesel fuel drip from the trucks.</p>	<p>The Regional Board will make changes to the Sump Wastewater Monitoring.</p> <p>See Errata Sheet Item No. 4.</p>

B. Comments submitted by the Department of Transportation on December 3, 2007

GENERAL COMMENTS & MAJOR CONCERNS	REGIONAL BOARD RESPONSES
<p>6. <u>The Department requests the RWQCB to add additional bimonthly post treatment sump water and septic tank monitoring and eliminate the requirement for groundwater monitoring.</u></p> <p>The post treatment sump water and septic tanks monitoring is significantly more effective and provides almost real time monitoring of discharges to the leachfield.</p>	<p>The Regional Board established groundwater monitoring criteria to ensure the reasonable protection of beneficial uses, water quality objectives, and prevention of nuisance in the Campo Hydrologic Area. Although the Regional Board recognizes that it may be possible for the quality of the water to be changed to some degree without reasonably affecting beneficial uses, this cannot be determined without the implementation of a groundwater monitoring program.</p> <p>Groundwater may be used for waste disposal or waste assimilation if designated beneficial uses are protected. In 1993 the US EPA designated the Campo/Cottonwood aquifer as a sole source of drinking water in a 400 square mile area. As such, it is essential to ensure the highest possible water quality is maintained. By establishing a groundwater monitoring program, the Regional Board can evaluate the discharge to assess potential adverse effects of the discharge on the Campo Sole Source Aquifer.</p> <p>Thus, the proposed changes have not been made.</p>